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Hearing Date: May 3, 2023
Hearing Time: 10:00am
Objection Deadline: April 26, 2023

Proposed Attorneys for the Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

BCM CRE OPPORTUNITY FUND LLP,

Case No.: 23-40964-jmm

Debtor.

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**NOTICE OF DEBTOR'S APPLICATION SEEKING THE ENTRY OF AN ORDER
EXTENDING THE DEBTOR'S TIME TO CURE FILING DEFICIENCIES
EFFECTIVE AS OF APRIL 5, 2023**

PLEASE TAKE NOTICE, that BCM CRE Opportunity Fund LLP, the debtor and debtor-in-possession (the "Debtor"), by and through its proposed counsel, the Law Offices of Avrum J. Rosen, PLLC, shall move before the Honorable Jil Mazer Marino, United States Bankruptcy Judge, on **May 3, 2023 at 10:00 a.m.** seeking the entry of an order extending the Debtor's time to cure its filing deficiencies, effective as of April 5, 2023, for a period of fourteen (14) days to April 19, 2023

PLEASE TAKE FURTHER NOTICE, that all hearing participants must register with eCourt Appearances two days in advance of all appearances. Registration is required by both attorneys and non-attorneys. If you have a CM/ECF account, you may access eCourt Appearances in the "Utilities" menu after logging into CM/ECF. If you do not have a CM/ECF account, you may access eCourt Appearances on the Court's website at <https://ecf.nyeb.uscourts.gov/cgi-bin/eCourtAppearances.pl>. Those unable to access eCourt Appearances must email Judge Mazer-Marino's Courtroom Deputy at:

jmm_hearings@nyeb.uscourts.gov at least two (2) business days prior to the hearing. Your email must include your name, case number, who you represent (if you are an attorney), hearing date, and phone number. The subject line of the email must include “I am not able to register using eCourt Appearances.”

PLEASE TAKE FURTHER NOTICE, that objections if any, to the Application must be in writing, conform with the Bankruptcy Code, the Bankruptcy Rules and the E.D.N.Y. Local Bankruptcy Rules, state with particularity the grounds therefor and be filed with the Bankruptcy Court no later than **April 26, 2023** as follows: (i) through the Court’s CM/ECF system, which may be accessed through the internet at the Court’s website at <https://www.nyeb.uscourts.gov/> and in portable document format (PDF) using Adobe Exchange Software for conversion; or (ii) if a party is unavailable to file electronically, such party shall submit the objection in PDF format on portable media in an envelope with the case name, case number, type and title of document, document number to which the objection refers and the file name on the outside of the envelope.

PLEASE TAKE FURTHER NOTICE, that only those objections that have been timely filed may be considered by the Court.

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PLEASE TAKE FURTHER NOTICE, that the hearing may be adjourned from time-to-time without additional notice other than said adjournment being announced in open Court.

Dated: April 5, 2023
Huntington, New York

Respectfully submitted,

Law Offices of Avrum J. Rosen, PLLC

By: /s/ Avrum J. Rosen
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*Attorneys for the Debtor
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